BEFORE THE POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION OFFICE OF THE SEGRETARY

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

SECOND SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS HATFIELD (UPS/USPS-T16-17)

(August 6, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness Hatfield (UPS/USPS-T16-17).

Respectfully submitted,

John E. McKeever Albert P. Parker, II Stephanie Richman

Attorneys for United Parcel Service

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Of Counsel.

SECOND SET OF INTERROGATORIES OF UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS HATFIELD

UPS/USPS-T16-17. Please refer to page 16, lines 8 and 9, of your testimony.

- (a) Does commercial air transportation move Parcel Post mail between facilities that are within the service area of a processing and distribution center? Please explain your answer.
- (b) Does commercial air transportation move Parcel Post mail between facilities that are within the service area of a BMC? Please explain your answer.
 - (c) If your answer is yes to either (a) or (b) above, please provide:
 - (i) Specific descriptions of all routings; and
 - (ii) The commercial air test year transportation costs for the routings.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.

Albert P. Parker, II

Dated: August 6, 1997

Philadelphia, PA